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March 26, 2004

VIA E-MAIL and FEDERAL EXPRESS

Amy G. Rabinowitz, Counsel
National Grid
25 Research Drive
Westborough, MA 01582-0099

RE: NSTAR Electric, D.T.E. 03-121

Dear Ms. Rabinowitz:

Enclosed please find the Members of the NE DG Coalition's First Set of Information Requests to Massachusetts Electric Company in the above-captioned matter. Responses should be filed on or before April 9, 2004. If you have any questions, please contact me.

Sincerely,

Robert M. Granger

RMG:nbc
Enclosures

cc: Mary Cottrell (by hand)
William Stevens (by hand)
John Cope-Flanagan (by hand)
Sean Hanley (by hand)
Claude Francisco (by hand)
Xuan Yu (by hand)
Robert Harrold (by hand)
Service List (by mail)

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

NSTAR ELECTIRC, DTE 03-121

**FIRST SET OF INFORMATION REQUESTS OF
THE MEMBERS OF THE NE DG COALITION TO
MASSACHUSETTS ELECTRIC COMPANY**

Pursuant to 220 C.M.R. 1.06(6)(c), the Members of the NE DG Coalition ("NE DG Coalition") hereby submit to Massachusetts Electric Company the following information requests with respect to the above captioned matter.

Instructions

The following instructions apply to this set of information requests and all subsequent information requests issued by the NE DG Coalition to Massachusetts Electric Company in this proceeding.

1. Each request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number, the docket number of the case, and the name of the person responsible for the answer. Please submit all responses on three-hole punched paper.
2. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The phrase "provide complete and detailed documentation" means provide all data, assumptions, and calculations on which the response relies; provide the source of and basis for all data and assumptions employed; include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates; and provide and explain all supporting workpapers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or

other markings that differentiate such copies from the original.

6. If the Company finds that any of these requests is ambiguous, please notify the NE DG Coalition counsel so that the requests can be clarified prior to the preparation of a written response.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

NSTAR ELECTIRC, DTE 03-121

**FIRST SET OF INFORMATION REQUESTS OF
THE MEMBERS OF THE NE DG COALITION TO
MASSACHUSETTS ELECTRIC COMPANY**

Pursuant to 220 C.M.R. § 1.06(6)(c), the Members of the NE DG Coalition ("NE DG Coalition") hereby submit to the Massachusetts Electric Company ("MECO") the following information requests.

- | | |
|----------------|--|
| NEDGC-MECO 1-1 | Referring to the Direct Testimony of Carlos A. Gavilondo ("Gavilondo Testimony") at page 6, lines 12-14, please state whether there is diversity between customers with on-site generation and customers without on-site generation at the local distribution level. |
| NEDGC-MECO 1-2 | <p>Referring to the Gavilondo Testimony at page 6, line 21 to page 7, line 5:</p> <ul style="list-style-type: none">(a) Please state whether: (1) distribution substations are designed to serve all the individual non-coincident peak load connected to the substation; (2) distribution feeders are designed to serve all the individual non-coincident peak load connected to the feeder; and (3) distribution transformers are designed to serve all the individual non-coincident peak load connected to the transformer.(b) Please state whether: (1) distribution substations are designed assuming that all interconnected generation will be out of service at the same time; (2) distribution feeders are designed assuming that all interconnected generation will be out of service at the same time; and (3) distribution transformers are designed assuming that all interconnected generation will be out of service at the same time.(c) Are substations, feeders and transformers designed assuming that greater diversity exists at these levels? |
| NEDGC-MECO 1-3 | Referring to the Gavilondo Testimony at page 12, lines 12-13, please describe "other ways which non-firm or reduced back-up service could be provided." |

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

CERTIFICATE OF SERVICE

NSTAR ELECTRIC, DTE 03-121

I hereby certify that I have this day served the foregoing First Set of Information Requests of the Members of the NE DG Coalition to Massachusetts Electric Company upon all parties of record in this proceeding in accordance with the requirements of 220 CMR 1.05(1) (Department's Rules of Practice and Procedure.)

Dated at Boston this 26th day of March, 2004.

Robert M. Granger

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